

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Bienvenido I. Lugo Marchant
Plaintiff

Civil Action No. 05 11317 NMG

2007 SEP -7 P 1:02

v.

Peter N. Tsickritzis, Kevin M. Kingston,
United Liquors Limited et al.
Defendants

U.S. DISTRICT COURT
DISTRICT OF MASS.

**MOTION TO DISBAR AND PREVENT JOAN ACKERSTEIN, ESQ., FROM
PRACTICING LAW FOR HER REPROACHABLE BEHAVIOR**

Bienvenido I. Lugo-Marchant ["BL"] asks this Honorable US Court to accept this **Motion** as BL saw a few disgusting moments of Ms. Ackerstein Esq., while handling this case. Specifically, Ms. Ackerstein Esq., knowingly, uttered false statements in order to complement her defense. Though not trained as a lawyer, BL believes Ms. Ackerstein comments were with the idea of deceiving and not telling the truth to the USDC. Mr. Tsickritzis ["PT"] exhibited an ungentlemanly manner while at the depositions, something that prompted Ms. Ackerstein, in the last one, to take him out for a while as he could not control himself in front of someone who did not make an issue of, as many commented, his having interfered with a drug related investigation that caused the death of a warehouse worker since PT's son was allegedly involved.

Ms. Ackerstein, at the end of the firsts hearing had a not becoming demeanor when BL tried to approach her to discuss the case. In fact, in another hearing when she was ordered to submit documents authored by BL, she lied about not having them. BL believes she was the one driving a silver car [or silver derived] by the front street of the USDC agitating her hands and yelling in frustration. BL wants this USDC to review its surveillance videos to confront her. BL did not want to raise this issue in the beginning for chivalry. BL believes the issues raised have not been solved yet and that he does not need to initiate another lawsuit against the defendants for willful mistakes they enjoy doing.

WHEREFORE, the Plaintiff respectfully prays this **Honorable US Court** allows this **Motion**

Very respectfully, the Plaintiff demands a **TRIAL BY JURY** in this action.

Respectfully submitted,



Bienvenido I Lugo-Marchant

Pro se, in forma pauperis

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2007, this document was served upon the defendant's counsel, JACKSON LEWIS, by first class mail, postage paid.